

Gary M. Hoffman (*Pro Hac Vice*)
Kenneth W. Brothers (*Pro Hac Vice*)
DICKSTEIN SHAPIRO MORIN
& OSHINSKY, LLP
2101 L Street, NW
Washington, DC 20037-1526
Phone (202) 785-9700
Fax (202) 887-0689

Edward A. Meilman (*Pro Hac Vice*)
DICKSTEIN SHAPIRO MORIN
& OSHINSKY, LLP
1177 Avenue of the Americas
New York, New York 10036-2714
Phone (212) 835-1400
Fax (212) 997-9880

Jeffrey B. Demain, State Bar No. 126715
Jonathan Weissglass, State Bar No. 185008
ALTSHULER, BERZON, NUSSBAUM, RUBIN & DEMAIN
177 Post Street, Suite 300
San Francisco, California 94108
Phone (415) 421-7151
Fax (415) 362-8064

Attorneys for Ricoh Company, Ltd.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICOH COMPANY, LTD.,

Plaintiff,
vs.

AEROFLEX INC., et al.

Defendants.

SYNOPSIS.,

VS. Plaintiff,

RICOH COMPANY, LTD.
Defendant.

Case No. C03-4669 MJJ (EMC)
Case No. C03-2289 MJJ (EMC)

DECLARATION OF MICHAEL A. WEINSTEIN IN SUPPORT OF ADMINISTRATIVE MOTION FOR A SEALING ORDER

1 Michael A. Weinstein declares as follows:

2 1. My name is Michael A. Weinstein, an attorney with the law firm of Dickstein, Shapiro,
3 Morin & Oshinsky, LLP, counsel for Ricoh Company Limited. I am over the age of 21 and am
4 competent to make this declaration. Based on my personal knowledge and information, I hereby declare
5 to all the facts in this declaration.

6 2. In case C03-4669, a Stipulated Protect Order ("Order1") was entered into on June 3, 2003
7 between the parties.

8 3. In case C03-2289, a Stipulated Protect Order ("Order2") was entered into on March 24,
9 2004 between the parties.

10 4. On June 21, 2006, counsel for Synopsys/Aeroflex et al. filed with the court a Reply
11 Memorandum in Support of Defendants' Motion to Compel Discovery, and a declaration with numerous
12 exhibits in support of Reply Memorandum, including a number of Ricoh's confidential documents
13 clearly marked "CONFIDENTIAL."

14 5. Ricoh Company, Ltd. requests permission to file under seal the following documents and
15 exhibits which are designated confidential as defined in both Order1 and Order2.

16 a. Exhibits 2, 7, 8, 13, and 23.

17 6. On June 21, 2006, counsel for Synopsys/Aeroflex et al. filed with the court
18 "Administrative Motion for a Sealing Order" requesting certain exhibits be filed under seal.

19 7. It is believed that the identified documents of 5a, *supra*, are privileged or protectable as a
20 trade secret or otherwise entitled to protection.

21 8. As such, the above identified exhibits should be filed under seal pursuant to Order1 and
22 Order2.

23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct.

25 Signed at Washington, D.C. on June 24, 2006.

26
27
28 June 24, 2006

/s/ Michael A. Weinstein
Michael A. Weinstein

Gary M. Hoffman (*Pro Hac Vice*)
 Kenneth W. Brothers(*Pro Hac Vice*)
 DICKSTEIN SHAPIRO MORIN
 & OSHINSKY, LLP
 2101 L Street, NW
 Washington, DC 20037-1526
 Phone (202) 785-9700
 Fax (202) 887-0689

Edward A. Meilman (*Pro Hac Vice*)
 DICKSTEIN SHAPIRO MORIN
 & OSHINSKY, LLP
 1177 Avenue of the Americas
 New York, New York 10036-2714
 Phone (212) 835-1400
 Fax (212) 997-9880

Jeffrey B. Demain, State Bar No. 126715
 Jonathan Weissglass, State Bar No. 185008
 ALTSHULER, BERZON, NUSSBAUM, RUBIN & DEMAINE
 177 Post Street, Suite 300
 San Francisco, California 94108
 Phone (415) 421-7151
 Fax (415) 362-8064

Attorneys for Ricoh Company, Ltd.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

RICOH COMPANY, LTD.,
 Plaintiff,

vs.

AEROFLEX ET AL,
 Defendants.

**CASE NO. CV 03-4669 MJJ (EMC)
 CASE NO. CV 03-2289 MJJ (EMC)**

**[PROPOSED] ORDER GRANTING
 ADMINISTRATIVE MOTION FOR A
 SEALING ORDER**

SYNOPSISYS, INC.,
 Plaintiff,

vs.

RICOH COMPANY, LTD.,
 Defendants.

1 On June 21, 2006, counsel for Synopsys/Aeroflex et al. filed an Administrative Motion for a
2 Sealing Order pursuant to Civil Local Rule 79-5(d), and requested permission to file under seal the
3 following Exhibits:

4 1. Exhibits 2, 7, 8, 13, and 23.

5 Because the above documents include and refer to materials produced in discovery and
6 designated confidential by Ricoh Company, Ltd., this request was made pursuant to the Stipulated
7 Protective Order in this action.

8 The Court hereby GRANTS this request.

9 IT IS SO ORDERED.

10
11 Dated: _____

12 _____
13 The Honorable Edward M. Chen
14 Magistrate Judge, United States District Court
15
16
17
18
19
20
21
22
23
24
25
26
27
28